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7 **UNITED STATES BANKRUPTCY COURT**
8 **NORTHERN DISTRICT**
9 **(SAN FRANCISCO DIVISION)**

10 In re:

11 PG&E CORPORATION

Bankruptcy Case

No. 19-30088-DM

12 -and-

Chapter 11

(Lead Case)

13 PG&E GAS AND ELECTRIC COMPANY

(Jointly Administered) Case

14 Debtors

No. 19-30089-DM

15 vs.

16 Theresa Ann McDonald

Proof of Claim No. 54975

17 Creditor

Filed October 21, 2019

Camp Fire

Judge: Honorable Dennis Montali

18
19 Emergency Pleading Requesting
20 Reconsideration of the Identification
21 of Parties who Timely Objected to
22 the Fire Victims Claims Resolution
23 Procedure

24
25 Relief Requested: Recognize the
26 Timely Objection of All Fire Victims
27 Who Voted to Reject the Proposed
28 Plan of Reorganization

1 I am a Fire Victim. My vote to reject the Proposed Plan was correctly registered at
2 Prime Clerk, and was received prior to the May 15, 2020, deadline.

3 I did not vote to reject only part of the Plan. I voted to reject all of it, including every
4 one of its associated documents. I do not recall seeing any language in the materials I
5 received that indicated I needed to follow up my vote with a detailed list of the parts of the
6 Plan to which I objected.

7 The Confirmation Order issued by the Court indicates that there are only a very few
8 people who objected to the Fire Victims Claims Resolution Procedure. I believe that is
9 incorrect. I believe that those of us who voted to Reject the Proposed Plan objected to the
10 entire document, not just one part of it. Indeed, since I don't believe it is possible to have a
11 feasible Plan without a Claims Resolution Procedure it appears very clear to me that I and the
12 others who voted to Reject the Proposed Plan were also objecting to the Fire Victims Claims
Resolution Procedure.

13 I checked the ballot that was sent out in the solicitation packet. It does not
14 include the option to reject the Plan but agree to the Fire Victim Trust Documents. A rejection
15 of the Plan is a rejection of all of the Plan's parts.

16 I realize that modifying the language in Footnote 7 as I am requesting increases the pool
17 of those who might seek court review of their claims by many thousands. However, to exclude
18 us from the pool simply because we registered only one, all encompassing objection to the
19 Proposed Plan and all of its components would clearly be unreasonable. Doing so would not
20 only deprive us of our due process rights, it would also require that any bankruptcy proceeding in
21 the future that required a vote by an impaired class would have to ask for a vote on each specific
22 document rather than a vote on the entire proposed plan of reorganization.

23 As the Court pointed out during the discussions regarding the right to seek court review
24 of claims, if the Fire Victims are treated fairly and their claims are adjudicated reasonably in the
25 internal review process there is little likelihood that many will turn to the courts for resolution of
26 their claims. This ability to seek independent court review is nothing more than an insurance
27 policy to ensure that the resolution of claims is done in a fair and equitable manner.
28

1 In view of these facts I respectfully request that the Court reconsider and revise the
2 language in Footnote 7 on Page 26 of the Order Confirming Debtors' and Shareholder
3 Proponents' Joint Chapter 11 Plan of Reorganization Dated June 19, 2020 (Document 8048)
4 which identifies the parties who timely submitted objections to the Fire Victim Trust Documents
5 to include the following: "...and all who objected to the Fire Victim Trust by voting in a timely
6 manner to reject the Proposed Plan."

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8 Theresa Ann McDonald
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From: [CANB Emergency Filings](#)
To: [REDACTED]
Subject: FW: Emergency Pleading to Reconsider Language in Footnote 7 of Order Confirming PG&E's Plan of Reorganization
Date: Friday, June 26, 2020 4:33:48 PM
Attachments: [Emergency Pleading to Reconsider Language in Footnote 7 of Order Confirming PG&E's Reorganization Plan.pdf](#)

From: Theresa Mcdonald [REDACTED]
Sent: Friday, June 26, 2020 3:48 PM
To: CANB Emergency Filings <CANB-EMERGENCY-FILINGS@canb.uscourts.gov>
Cc: Anne Whitaker [REDACTED]
Subject: Emergency Pleading to Reconsider Language in Footnote 7 of Order Confirming PG&E's Plan of Reorganization

Section 18, Paragraph k of the Order Confirming Debtors' and Shareholder Proponents' Joint Chapter 11 Plan of Reorganization dated June 19, 2020, is titled, Court Review of Claims. This paragraph includes Footnote 7, which identifies a very narrow pool of Fire Victims who are being allowed to retain their right to seek court review of the settlement of their claims. I believe that pool has been incorrectly identified, which has caused me to submit the attached Pleading asking that the Court revise the language in Footnote 7.